

# **EXHIBIT 21**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   NORTHEASTERN DISTRICT OF OHIO  
3                   EASTERN DIVISION  
4       IN RE NATIONAL PRESCRIPTION  
5       OPIATE LITIGATION                               MDL No. 2804  
6  
7       This document relates to:                   Case  
  No. 17-md-2804  
8       The County of Cuyahoga v.  
          Purdue Pharma, L.P., et al.,               Judge Dan Aaron  
9       Case No. 18-OP-45090                       Polster  
10      City of Cleveland, Ohio vs.  
          Purdue Pharma, L.P., et al.  
11      Case No. 18-OP-45132  
12      The County of Summit, Ohio, et al.,  
          v. Purdue Pharma L.P., et al.,  
13      Case No. 1:18-OP-45004 (N.D. Ohio)

14  
15               The videotaped deposition of DEMETRA  
16       ASHLEY, called for examination pursuant to the  
17       Rules of Civil Procedure for the United States  
18       District Courts pertaining to the taking of  
19       depositions, taken at 10 South Wacker Drive,  
20       Suite 4000, Chicago, Illinois, on the 15th day of  
21       March, 2019, at the hour of 9:16 a.m.

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24       Reported by: Gina M. Luordo, CSR, RPR, CRR  
25       License No.: 084-004143

1 in the regulation, to take a look at the order,  
2 make a determination if it's deviating from what's  
3 usual. I mean, how you do it, it can be manual or  
4 automatic, but it's just that it needs to be done.

5 Q. And the criteria that determines whether  
6 it deviates from pattern or too large or anything  
7 else is criteria that is to be set by the  
8 distributors?

9 A. Correct.

10 Q. And so it's within their discretion; is  
11 that correct?

12 A. That's correct.

13 Q. And is it correct that the distributors  
14 must define their own parameters for a suspicious  
15 order?

16 A. There's some regulation requirement that  
17 it be effective. So other than that, it's their  
18 discretion, but it just must be effective.

19 Q. And whether a system is effective is in  
20 itself a subjective determination; isn't that  
21 correct?

22 A. Yes, I would agree with that.

23 Q. Okay. Are you aware that the United  
24 States Government Accountability Office, the GAO,  
25 issued a report in June of 2015 that stated that